

from Henry Culler unto Jesse M. Little, conveying other lots in Jefferson, dated June 12, 1841 and recorded in Liber H.S. 14, folio 190, Land Records of Frederick County, Maryland.

14. That no out conveyance from the said Henry Culler, or other chain of title involving Lot 38 and the described portion of Lot 39, can be located in the Land Records of Frederick County, Maryland.

15. That Complainant's attorneys have abstracted title to Lot 32 as shown on such plat. Complainant has been able to locate a chain of title to Lot 32 which is entirely independent of Complainant's chain of title.

16. That as the last reference of record to the subject property was in 1841, Complainant has no method of ascertaining the whereabouts of any parties interested in the subject property.

17. That Fredericktown Bank and Trust Company, a Maryland bank corporation, is a lien holder on the properties now claimed by Complainants.

18. That such bank has waived any interest it may have in the outcome of this litigation, as is shown by copy of the waiver attached hereto.

19. That since at least 1934, and apparently since the 1850's, Complainants and their predecessors in title have maintained open, notorious, hostile, continuous, exclusive and adverse possession of the subject property.

WHEREFORE, Complainants request that this Court:

A. Order that any and all unknown persons having any interest in the land that is the subject of this proceeding be served with process by posting the land pursuant to Maryland Rule 111.

B. Declare that the Complainants have good and marketable fee simple title to the subject property; subject to the mortgage of Fredericktown Bank and Trust Company dated November 19, 1973, and recorded in Liber 928, folio 127, Land Records of Frederick County, Maryland.

C. And grant such other and further relief as the nature of the case may require.